

**STATE OF VERMONT  
BOARD OF MEDICAL PRACTICE**

<b>In re:</b>	)	<b>MPC 15-0203</b>	<b>MPC 110-0803</b>
	)	<b>MPC 208-1003</b>	<b>MPC 163-0803</b>
<b>David S. Chase,</b>	)	<b>MPC 148-0803</b>	<b>MPD 126-0803</b>
	)	<b>MPC 106-0803</b>	<b>MPC 209-1003</b>
<b>Respondent.</b>	)	<b>MPC 140-0803</b>	<b>MPC 89-0703</b>
	)	<b>MPC 122-0803</b>	<b>MPC 90-0703</b>
	)		<b>MPC 87-0703</b>

**MOTION TO ENDORSE CONSENT ORDER**

Respondent, David S. Chase, M.D., through counsel, hereby requests the Board to endorse the attached Consent Order, whereby Respondent voluntarily agrees to refrain from the practice of medicine in any jurisdiction until the resolution of the State's Superceding Specification of Charges by the Board. In support of his Motion, Respondent relies upon the following Memorandum and the Consent Order attached hereto.

**MEMORANDUM**

On March 31, 2004, the Vermont Board of Medical Practice (the "Board") granted Dr. Chase's motion to reinstate his license but denied his motion to dismiss the Superceding Specification of Charges.

Dr. Chase is committed to follow a course of conduct that ensures that the public has complete confidence in the integrity of all licensed medical professionals. He therefore has no desire to practice medicine until his name is fully cleared in this proceeding and is willing to provide the State and the Board with assurances to that effect.

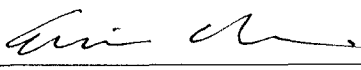
Toward that end, on March 31, 2004, Dr. Chase proposed that he and the State stipulate to a Board Order by which he would voluntarily refrain from practicing medicine pending resolution of this case. Unfortunately, the State would not agree to the language of Dr. Chase's

proposed stipulation, despite numerous efforts to satisfy the State's expressed concerns regarding the document. Instead, the State indicated its intent to again move for the summary suspension of Dr. Chase's medical license, thereby unnecessarily expending the parties' and the Board's limited resources.

In order to provide the State and the Board with assurances that he will not practice medicine until his name is fully cleared through a merits hearing in this matter, and in order to preserve the parties' and the Board's limited resources, Dr. Chase hereby requests that the Board endorse and enter the Consent Order submitted herewith. Through the Consent Order, Dr. Chase voluntarily offers not to engage in the practice of medicine in any way in any jurisdiction until resolution of the Superseding Specification of Charges by the Board. When endorsed by the Board, this Order will ensure that the public has complete confidence in the integrity of the medical profession and will eliminate any concerns the State continues to harbor regarding protection of the public's health, safety, and welfare.

Dated at Burlington, Vermont, this 6<sup>th</sup> day of March 2004.

SHEEHY FURLONG & BEHM P.C.  
Attorneys for DAVID S. CHASE, M.D.

By:   
Eric S. Miller  
R. Jeffrey Behm  
Ian P. Carleton  
30 Main Street  
P.O. Box 66  
Burlington, VT 05402  
(802) 864-9891